

Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

McKENNA DUFFY and MICHAEL BRETT,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

YARDI SYSTEMS, INC., BRIDGE
PROPERTY MANAGEMENT, L.C.,
CALIBRATE PROPERTY MANAGEMENT
LLC, DALTON MANAGEMENT, INC.,
HNN ASSOCIATES, LLC, LEFEVER
MATTSON, MANCO ABBOTT, INC.,
MORGUARD CORPORATION, R.D. M
ERRILL REAL ESTATE HOLDINGS, LLC,
SUMMIT MANAGEMENT SERVICES,
INC., and CREEKWOOD PROPERTY
CORPORATION,

Defendants.

CASE NO. 2:23-cv-01391-RSL

**DEFENDANT LEFEVER MATTSON
PROPERTY MANAGEMENT'S
NOTICE OF PENDENCY OF
BANKRUPTCY CASE AND
AUTOMATIC STAY**

PLEASE TAKE NOTICE that on September 12, 2024 (the "Petition Date"), LeFever Mattson, a California corporation, and certain affiliates, (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code ("the Bankruptcy Code") with the United States Bankruptcy Court for the Northern District of California (Santa Rosa

1 Division) (the “Bankruptcy Court”). At a hearing held on September 18, 2024, the Bankruptcy
2 Court ordered that the Debtors’ chapter 11 cases (the “Chapter 11 Cases”) be jointly administered
3 for procedural purposes only under Lead Case No. 24-10545 (CN), *In re LeFever Mattson*. The
4 Chapter 11 Cases are pending before the Honorable Charles Novack, United States Bankruptcy
5 Judge.

6 **PLEASE TAKE FURTHER NOTICE** that the Debtors in the Chapter 11 Cases include
7 Home Tax Service of America, Inc., dba LeFever Mattson Property Management, defendant herein.

8 **PLEASE TAKE FURTHER NOTICE** that, pursuant to section 362(a) of the Bankruptcy
9 Code (the “Automatic Stay”), the filing of a bankruptcy petition “operates as a stay, applicable to
10 all entities,” of, among other things, “the commencement or continuation, including the issuance or
11 employment of process, of a judicial, administrative, or other action or proceeding against the debtor
12 that was or could have been commenced before the commencement of the case under [the
13 Bankruptcy Code], or to recover a claim against the debtor that arose before the commencement of
14 the [bankruptcy] case” and “any act to obtain possession of property of the estate or of property
15 from the estate or to exercise control over property of the estate.” 11 U.S.C. § 362(a)(1), (3). The
16 causes of action alleged in the Complaint filed in the above-captioned case are claims against one
17 or more of the Debtors that allegedly arose before the commencement of the Debtors’ Chapter 11
18 Cases. Accordingly, the above-captioned matter has been automatically stayed pursuant to section
19 362(a) of the Bankruptcy Code.

20 **PLEASE TAKE FURTHER NOTICE** that any action taken against the Debtors without
21 first obtaining relief from the Automatic Stay from the Bankruptcy Court is void *ab initio* and may
22 result in a finding of contempt for violation of the Automatic Stay. The Debtors reserve and retain
23 their statutory right to seek relief in the Bankruptcy Court from any action by Complainant(s) or
24 any judgment, order, or ruling entered in violation of the Automatic Stay.

25 **PLEASE TAKE FURTHER NOTICE** that in the event the Court or any parties have
26 questions regarding the Chapter 11 Cases, please contact bankruptcy counsel for the Debtors:

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Dated: September 19, 2024

Respectfully submitted,

SHOOK, HARDY & BACON

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*Attorneys for Defendant Lefever Mattson
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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties, if any, shall be served in accordance with the Federal Rules of Civil Procedure.

/s/ Christina Bass

Christina Bass, Legal Assistant